

UNITED STATES DISTRICT COURT

for the

District of New Jersey



_____newark_____ Division

Alvin Reid

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Sandra Connolly, Dr. Salem, Anthony Gangi, Patrick Nogan, Sgt. CaliChillo, Lt. Duncan, Therese Key Et AL.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Alvin Reid		
Address	1895 walton ave apt 2c		
	bronx	ny	10453
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	kings		
Telephone Number	9178069271		
E-Mail Address	keytofreedom33@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	anthony gangi		
Job or Title <i>(if known)</i>			
Address	168 frontage road		
	newark	nj	07114
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Essex		
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name	Dr. Salem		
Job or Title <i>(if known)</i>	head of mental health		
Address	168 frontage road		
	newark	nj	07114
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Essex		
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Defendant No. 3

Name Dr. Connolly

Job or Title *(if known)* Head of medical

Address 168 frontage road

newark

nj

07114

City

State

Zip Code

County

essex

Telephone Number

E-Mail Address *(if known)*
☐ Individual capacity
 ☒ Official capacity

Defendant No. 4

Name Sgt. Calichillo

Job or Title *(if known)* extraction supervisor

Address 168 frontage road

newark

nj

07114

City

State

Zip Code

County

essex

Telephone Number

E-Mail Address *(if known)*
☐ Individual capacity
 ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? I wanted to do a hunger strike and instead I was assaulted by officers after being cleared for hunger strike, I also was in the midst of a mental breakdown and my 8th amendment rights were violated and because Dr. Salem denied me medical treatment to this day I have nerve damage in my left arm 23 months later my fingers are still numb, pinched nerve in my neck because I was told I was cleared for hunger strike then 2 days later on 10/18/19 Sgt. Calichillo came to extract me instead of taking me to the infirmary so they could monitor my peaceful protest protected by the 1ST amendment. I asked for

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
S.U. at Northern state prisom

- B. What date and approximate time did the events giving rise to your claim(s) occur?
10/18/19 at about 1:30 pm

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

The door opens, blast shield lands on my back with an officer pressing on it, blows follow from the two men kneeling on the floor by my head, I AM punched in the face, they are pulling my ears back hitting me in pressure points, punching me in the ribs, kneeing me in the ribs I feel, I hear, I know at least one of my ribs has been cracked, that once again it is broken, this causes me to lose my position and they pull my legs from under me. Now I AM laying on my belly, hands/arms protecting my face/head, they take this oppurtunity and begin standing on my upper back until I AM about to pass out everythiung goes black. In hopes of breathing again I move my hands from protecting my head to my side and they begin to cuff mey left wrist and forearm up between my shoulder blades pulling and as they pull me up from the ground I look in the mirror I see what I could not feel due to the shock of having my rib broken and pressure points attacked I see the officer short squat guy with a sadistic look in his face as he is applying martial arts grips to my fingers and hand intentionally inflicting pain and this continues as they try for the next arm and they pull me up my left shoulder comes out of the socket and breaking my fingers. Then I feel again and a finger snaps I fall back to the ground and they drag me out of the cell

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I needed an MRI and still have yet to receive one. I was cleared on 12/13/19 by the OUTside doctors to receive a MRI. The Doctor who tended to me that day was disgusted I had not received a MRI yet and could tell simply by having me take my shirt off and push against the wall that my collar bone was in jeopardy. NO pain meds no sling never gave me the MRI even though my nerve test on 12/13/19 show serious damage (my left index finger has been numb all week = left pinky all the way up the arm through collar bone and up and down spine...discs buldge, there is a pinched nerve in my neck, and their false reports have made way for irreperable damage.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I AM looking for 2,333,333 dollars . In actual damages I will never be the same again, I cant face forward, I cant stand up for more than 10 minutes at a time sometimes, cant sit up, hurts riding in the car. I can't perform physical labor, the least demanding tasks have me spending literally more than ten times the amount of time recuperating. I recently have come to experience my subconscious reactions to the mere thought of the state of my physical health: Automatically I feel like a victim and am depressed and rejected; my heart chakra has been damaged for 2 years - pain and suffering is an understatement - mental anguish the bodily harm. I AM seriously handicapped and to be denied MRI and treatment was so traumatizing that these last 5 months I spent as a free a man, for the first time in 5 years, have been hell. Living with reality of having my humanity stripped so deeply, and in some areas for so long, I got diabetes in may, 05/2021, doctor said sugar was high for at least 2 months; could have gone into shock, A1C was almost 4 points higher and this is because I could not work out due to injury, because I stopped leaving my cell due to mental injury. Punitive - you cannot take away the 1st amendment, it is crazy I said "I can't breathe" a year before another black man did... THEY CANNOT CONTINUE TO IGNORE US. Please God show up strong please They confined me and they hurt me and still I have received no help. I can't stand straight. My neck is so damaged Pain Killers seem to be my only option. I await surgery and can entertain no Job as my daily life is truly a fight for my sanity and will to live.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/18/2021

Signature of Plaintiff alvin reid

Printed Name of Plaintiff Alvin Reid

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City

State

Zip Code

Telephone Number _____

E-mail Address _____